

## Erik Dykema, Esq. **BOCHNER IP. PLLC**

295 Madison Avenue, 12<sup>TH</sup> Floor, New York, NY 10017 o 646.971.0685 E erik@bochnerip.com w bochnerip.com

February 17, 2023

## **VIA ECF**

The Honorable Judge Jennifer H. Rearden United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: MCM Group 22 LLC v. Perry, No. 22-cv-06157-JHR-VF

Dear Honorable Judge Rearden:

We represent Plaintiff MCM Group 22 LLC in the above referenced matter and write this joint letter requesting an extension of time, with the consent of Defendant (collectively, "the parties"). Pursuant to Rule 2(E) of Your Honor's Individual Rules of Practice, the parties request an extension of time for both Plaintiff's Opposition and Defendant's Reply Brief in relation to Defendant's Motion to Dismiss.

The original deadlines and proposed deadlines are as follows:

Plaintiff's Opposition	Current Deadline:	Proposed Deadline:
	February 22, 2023	March 8, 2023
Defendant's Reply Brief	Current Deadline:	<b>Proposed Deadline:</b>
	March 1, 2023	March 22, 2023

This is the first request made by the parties for an extension of time related to Defendant's Motion to Dismiss. The jointly requested extension does not affect any other upcoming deadlines in this matter.

The Parties thank the court for its time and attention to this matter.

Respectfully submitted,

/s/ Erik Dykema Erik Dykema, Esq. Attorney for Plaintiff